

EXHIBIT 9

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 FOR THE COUNTY OF SAN BERNARDINO
3
4 ESTATE OF ALEXANDRA LUCIA)
5 MORENO; by and through her Successor)
in Interest, Liam Moreno; et al.)
)
6 Plaintiffs,)
)
7 v.) Case #CIVDS1406296
)
8 CONTINENTAL TIRE THE AMERICAS, an)
9 Ohio Limited Liability Company; FORD)
MOTOR COMPANY; SUNRISE FORD, a)
California Corporation; RCBRAKEPRO)
10 INCORPORATED dba Brake Pros 1, a)
California Corporation; and DOES 1)
11 through 100;)
)
12 Defendants.)
)
13)
14 AND RELATED CROSS-ACTIONS.)
)

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16 Deposition of Robert Pascarella, taken on
17 behalf of the Plaintiffs at 100 Wilshire
18 Boulevard, Twenty-First Floor, Santa Monica,
19 California, commencing at 9:11 a.m.,
20 Wednesday, December 2, 2015.

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24 Reported by: Jennifer R. Jones
CSR No. 13144
25

1 would consider that more of a -- I was brought in as a
2 guest evaluator based on my background to provide any
3 feedback. I would not say -- I think as you're asking
4 the question, I don't think I would consider that
5 development. It would be more fresh eyes review
6 offering some feedback.

7 Q So occasionally going out on a test track and
8 driving a vehicle and telling the folks who are working
9 on the various aspects how it felt?

10 A Correct.

11 Q And in the first time of your employment with
12 Ford, you did actually do the product development
13 testing and specifically with respect to evaluating
14 vehicle and tire performance; correct?

15 A That would -- the vast majority of what I did
16 was vehicle design and development for my first
17 18 years.

18 Q Okay. In terms of your representation here
19 today on behalf of Ford Motor Company on issues related
20 to the owner's manuals, what specifically is your
21 background, training, and experience that relates to the
22 drafting and modification of the Ford owner's manuals?

23 A I think most people, and it depends on your
24 job function, but as I was a supervisor in vehicle
25 dynamics for many years, as an example there's a

1 different group that is responsible for the overall
2 publishing and release of the owner's manual, but they
3 of course would send certain sections to subject matter
4 experts on the particular programs for evaluation and
5 input. And that's what my background would have been
6 with the owner's manuals, at least up through 2003.

7 Q Okay. Have you familiarized yourself with the
8 history of the tire warning in the Ford owner's manuals
9 for Ford Expeditions?

10 A I have.

11 Q And how have you done that? What have you
12 done to familiarize yourself?

13 A A lot of that was, of course, with my work
14 with Dr. Baldwin with respect to tire aging. So a lot
15 of that, of course, eventually came to I guess more the
16 significant modifications regarding tires and the tire
17 aging protocols that were being developed in the 2005 to
18 '6 time frame.

19 Q And that was -- you were still at Ford Motor
20 Company during the time that Ford was, through
21 Dr. Baldwin, researching tire aging and then coming up
22 with its recommendation to consumers; is that right?

23 A Correct.

24 Q And what I want to show you is, just to kind
25 of give us a time frame, I'm going to mark as Exhibit 2